

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**JANE DOE,**  
*Plaintiff*

**V.**

**HARRIS COUNTY, TEXAS, et al.**  
*Defendants.*

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**CIVIL ACTION NO. 4:16-CV-02133**

**DEFENDANT HARRIS COUNTY SHERIFF'S OFFICE  
DETENTION OFFICER TAYLOR ADAMS' DESIGNATION OF EXPERTS**

Defendant Harris County Sheriff's Office Detention Officer Taylor Adams in her Individual Capacity ("Officer Adams") now designates the following persons as expert witnesses who may be called to testify at the trial of the above cause:

**I.  
RETAINED EXPERTS**

Jay O. Coons, Ph.D.  
Coons & Associates  
4747 Research Forest Drive Ste.180-119  
The Woodlands, Texas 77381-4902  
(713) 628-0483

Dr. Coons will testify, pursuant to Federal Rules of Evidence ("FRE") 702, 703, and 705, about the law enforcement issues involved in the contact between Officer Taylor Adams and Jane Doe on January 8, 2016, Dr. Coons will testify about the Harris County Sheriff's Office policies on use of force, the use of force continuum and Officer Adams' application of the Empty Hand Control-Soft Technique and the reasonableness of her use of force. Dr. Coons will testify about the policies and procedures of the Harris County Sheriff's Office, the officer's training, policies and procedures with regard to Harris County Jail and other law enforcement matters relating to the incident on which this lawsuit is based. Each of Dr. Coons' opinions is set forth in the Preliminary Report of Jay O. Coons, Ph.D., which is produced in accordance with the Scheduling Order entered in this cause. A copy of Dr. Coons' curriculum vitae and a list of the cases in which he has previously testified and his compensation is attached hereto.

**II.**  
**NON-RETAINED EXPERTS**

Mary E. Baker  
Assistant County Attorney  
1019 Congress, 15<sup>th</sup> Floor  
Houston, Texas 77002  
(713) 274-5133

Ms. Baker is a non-retained expert who will testify regarding the reasonableness and necessity of the attorneys' fees sought by all the parties in this case, if any, and related issues. Ms. Baker's testimony will be based upon her knowledge and experience as a licensed and practicing attorney in Houston, Harris County, Texas where she has practiced for approximately thirty-four (34) years. Ms. Baker's testimony will also be based upon her percipient knowledge regarding the prosecution and defense of this case, the reasonableness and necessity of time expended on same, and on reasonableness and costs of conducting discovery and expert discovery, preparing for trial, trying the case, and any post-trial or appellate costs and fees. Ms. Baker's qualifications are attached hereto.

Officer Adams does not designate any non-retained experts.

**III.**  
**PERSONS WITH KNOWLEDGE OF FACTS RELEVANT TO THIS LAWSUIT**  
**WHO MAY PROVIDE EXPERT TESTIMONY**

The individuals who are listed below are not retained, but may provide expert testimony in the course of providing testimony regarding their knowledge of facts relevant to this lawsuit. This list is given in an abundance of caution, and subject to change as the case progresses.

1. Officer Taylor Adams  
c/o Mary E. Baker  
1019 Congress, 15<sup>th</sup> Floor  
Houston, Texas 77002

Defendant in this proceeding; has knowledge of the incident on which Plaintiff's claim against her is based.

2. Deputy N.C. Mills  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Prepared the ARS report for the incident on which Plaintiff's claim against Officer Adams is based.

3. Detention Officer V. Rojas  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Present at the incident on which Plaintiff's claim against Officer Adams is based.

4. Detention Officer Y. Gray  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Handcuffed Plaintiff after the incident on which Plaintiff's claim against Officer Adams is based.

5. Detention Officer T. Neely  
Detention Officer J. Trevino  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Escorted Plaintiff to the Harris County Jail Medical Division after the incident on which Plaintiff's claim against Officer Adams is based.

6. Assistant District Attorney Fiedler  
Harris County District Attorney's Office  
500 Jefferson Street  
Houston, Texas 77002

Accepted a charge of Assault of a Public Servant after the incident on which Plaintiff's claim against Officer Adams is based.

7. Dr. Kolber  
Harris County Sheriff's Office  
Medical Division  
1200 Baker Street  
Houston, Texas 77002

Treated Plaintiff in the Harris County Jail Medical Clinic after the incident on which Plaintiff's claim against Officer Adams is based.

8. Sgt. Leachman  
Classification Detention Officer J. Davis  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Notified of the incident on which Plaintiff's claim against Officer Adams is based.

9. Officer S. Mattox  
Harris County Sheriff's Office  
1200 Baker Street  
Houston, Texas 77002

Witness to the incident on which Plaintiff's claim against Officer Adams is based. Called the Floor Control Center for all available rovers to assist.

#### **IV. CROSS-DESIGNATION OF WITNESSES**

Officer Adams hereby cross-designates and states she may call any expert witness identified or designated by Plaintiff, subject to any objections Officer Adams may make concerning the designation of those expert witnesses, including, but not limited to, their qualifications.

#### **V. CROSS-EXAMINATION**

Officer Adams reserves the right to elicit, by way of cross-examination, opinion testimony from experts designated and called by all other parties to this suit. Officer Adams may also call, as a witness associated with other parties, any expert witness of any party who may be added to this lawsuit.

#### **VI. RIGHT TO WITHDRAW DESIGNATION OF ANY EXPERT**

Officer Adams reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

**VII.**  
**RIGHT TO ELICIT ANY EXPERT OPINION OR LAY OPINION TESTIMONY**

Officer Adams reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not violate any existing court order or the Federal Rules of Evidence.

**VIII.**  
**DESIGNATION OF ADVERSE PARTIES**

Officer Adams hereby designates, as adverse parties, potentially adverse parties, and/or as witnesses associated with adverse parties, all parties to this suit and all experts designated by any party to this suit, even if the designated party is not a party to the suit at the time of trial. In the event a present or future party designates an expert, but is subsequently dismissed for any reason from the suit or fails to call any designated expert, Officer Adams reserves the right to designate and/or call any such party or any such experts previously designated by any party.

**IX.**  
**RESERVATION OF ADDITIONAL RIGHTS**

Officer Adams reserves whatever additional rights she may have with regard to experts, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the case law construing same, and the rulings of the trial court, including, but not limited to, the right to designate rebuttal experts.

**X.**  
**RESERVATION OF RIGHT TO SUPPLEMENT DESIGNATION**

Officer Adams reserves the right to supplement this designation with additional designations of experts within any time limits imposed by the Court or any alterations of same by

subsequent court order or agreement of the parties pursuant to the Federal Rules of Civil Procedure and/or Federal Rules of Evidence.

Respectfully submitted,

OF COUNSEL:

VINCE RYAN  
HARRIS COUNTY ATTORNEY

/S/ Mary E. Baker  
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MARY E. BAKER  
Senior Assistant County Attorney  
Federal I.D. No. 7647  
State Bar No. 08534000  
1019 Congress, Fifteenth Floor  
Houston, Texas 77002  
Telephone: (713) 274-5133  
Facsimile: (713) 755-8924  
[Mary.Baker@cao.hctx.net](mailto:Mary.Baker@cao.hctx.net)

ATTORNEY-IN-CHARGE FOR DEFENDANT  
HARRIS COUNTY SHERIFF'S OFFICE  
DETENTION OFFICER TAYLOR ADAMS

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2019, a true and correct copy of Defendant Harris County Sheriff's Detention Officer Adams' Designation of Experts was served upon all parties of record via CM/ECF system:

Sean Ryan Buckley  
Sean Buckley & Associates  
770 South Post Oak Lane, Ste. 620  
Houston, Texas 77056  
[buckleyfirm@gmail.com](mailto:buckleyfirm@gmail.com)

Maisie A. Barringer, Partner  
Jenkins & Kamin, L.L.P.  
Two Greenway Plaza, Suite 600  
Houston, Texas 77046  
[mbarringer@jenkinskamin.com](mailto:mbarringer@jenkinskamin.com)

*Attorneys for Plaintiff Jane Doe*

Seth Hopkins  
Assistant County Attorney  
Celena Vinson  
Assistant County Attorney  
1019 Congress, 15<sup>th</sup> Floor  
Houston, Texas 77002  
[seth.hopkins@cao.hctx.net](mailto:seth.hopkins@cao.hctx.net)  
[celena.vinson@cao.hctx.net](mailto:celena.vinson@cao.hctx.net)

*Attorneys for Defendant Harris County*

/S/ Mary E. Baker  
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MARY E. BAKER  
Senior Assistant County Attorney